

21st Floor 1251 Avenue of the Americas New York, NY 10020-1104

John M. Magliery 212.603.6444 tel 212.379.5212 fax

johnmagliery@dwt.com

USDC SDNY DOCUMENT ELECTRONICALLY FILEI

DATE FILED:

5/9/2021

May 8, 2021

Via ECF

The Honorable Stewart D. Aaron United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re: SM Kids, LLC v. Google LLC, et al., Case No. 18 Civ. 2637 (LGS)

Dear Judge Aaron:

We represent Plaintiff SM Kids, LLC ("SM Kids") in the above-captioned matter. We write jointly on behalf of SM Kids and Defendants Google LLC, Alphabet Inc., and XXVI Holdings Inc. to respectfully request an additional adjournment of all deadlines and hearings in this case. The parties have agreed to enter into private mediation, which will be conducted on June 3, 2021, under the auspices of JAMS. Therefore, the parties request this additional extension so that they may focus on the mediation and to save the parties' and the Court's resources during this time. We therefore respectfully request that the Court extend the length of the stay granted at ECF No. 269 as stated in the chart below:

Event	Currently Scheduled Deadline	Proposed Deadline
Deadline for the Parties to Inform the Court of the Outcome of the Mediation	N/A	June 4, 2021
SM Kids' Opposition to Google's Motion to Compel Production of Documents from SM Kids' Privilege Log and Third Parties' Privilege Logs	May 10, 2021	June 10, 2021
Google's Deadline to take Jared Lader Deposition	May 11, 2021	June 11, 2021
SM Kids' Opposition to Motion to Compel production of documents from Ganz	May 11, 2021	June 11, 2021
Parties' Deadline to submit a joint letter regarding their meet and confer about Google Analytics and GoDaddy web traffic	May 14, 2021	June 14, 2021

	Currently Scheduled Deadline	Proposed Deadline
Google's Reply in Support of Motion to Compel Production of Documents from SM Kids' Privilege Log and Third Parties' Privilege Logs	May 18, 2021	June 21, 2021
production of documents from Ganz		June 21, 2021
Hearing on Google's Motion to Compel Production of Documents from SM Kids' Privilege Log and Third Parties' Privilege Logs	2:00nm	June 30, 2021, or another date convenient for the Court

We are grateful for the Court's attention to this matter.

Stent d. aun

Respectfully submitted,

Davis Wright Tremaine LLP

cc: All Counsel of Record (by ECF)

Request GRANTED. The date for the hearing on Google's motion to compel production of documents from SM Kids' privilege log and third parties' privilege logs shall be set by separate Order. SO ORDERED.

Dated: 5/9/2021

4817-5606-0136v.4 0105380-000001